December 24, 2001

Magalie Romas Salas, Secretary
FEDERAL COMMUNICATIONS COMMISSION
TW-A325
445 12th Street, S.W.
Washington, D.C. 20554

Dear Secretary Salas,

Enclosed please find the Supplement Comments sought by the Chief of the Enforcement Bureau on

National Cable Television Association and the Media Access Project

Ex Parte

Presentations Regarding EAS Decoders

EB Docket No. 01-66

Sincerely,

Darryl E. Parker
Senior Vice President for Business Development
TFT, Inc.
2243 Ringwood Avenue
San Jose, California 95131-1737
Tel: 408-943-9323, Extension 215
Fax: 408-432-9218
E-mail: Dparker@TFTInc.com

CC: Technical and Public Safety Division
FEDERAL COMMUNICATIONS COMMISSION
445 12th Street, S.W., Suite 7-C802
Washington, D.C. 20554

Enclosures: (as stated)

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	EB Docket No. 01-66
Amendment of Part 11 of the Commission's Rules	)	
Regarding the Emergency Alert System	)	

SUPPLEMENTAL COMMENTS

Of

TFT, Inc.
2243 Ringwood Avenue
San Jose, California 95131-1737

On

DA 01-2775
National Cable Television Association and the Media Access Project
Ex Parte
Presentations Regarding EAS Decoders

Darryl E. Parker
Senior Vice President
TFT, Inc.
2243 Ringwood Avenue
San Jose, California 95131-1737
Tel: 408-943-9323, Extension 215
Fax: 408-243-9218
E-mail: Dparker@TFTInc.com

Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

In the Matter of	)	
	)	EB Docket No. 01-66
Amendment of Part 11 of the Commission's Rules	)	
Regarding the Emergency Alert System	)	

SUPPLEMENTAL COMMENTS OF TFT, INC. ON NATIONAL CABLE TELEVISION ASSOCIATION AND THE MEDIA ACCESS PROJECT *EX PARTE* PRESENTATIONS REGARDING EAS DECODERS

Introduction and Summary

The Commission's Enforcement Bureau solicited supplemental comments on National Cable Television Association (NCTA) and the Media Access Project (MAP) *ex parte* presentations regarding EAS decoders.[1] TFT, Inc., a manufacturer of Type Certified Emergency Alert System (EAS) Encoder/Decoders and experienced electronics manufacturer in the Silicon Valley Area of California, files comments on the likelihood of TFT's manufacture and certification of an EAS decoder, the date of availability of such a decoder[2], the need for such a decoder, and the means of using the EAS without such a decoder to inform the public of an emergency. Generally, TFT supports the requests proposed by NCTA and MAP.

---

[1] *Public Notice,* DA 01-2775, FCC EB 01-66, released November 30, 2001.
[2] Ibid., Page 2

Plans to Certify a Decoder[3]

TFT has no current plans to certify a decoder only under Part 11[4]. TFT already manufactures a Type-Certified EAS Encoder/Decoder. The savings realized from removing the encoder section and still complying with the decoder requirements will be minimal.

TFT already manufactures a non-certified EAS decoder, called Safety 1st, for the commercial and industrial markets, not subject to Part 11 regulation. The Safety 1st has the ability to receive EAS messages from a variety of sources with a built-in NOAA Weather Radio Receiver and an optional space for an additional receiver. This optional receiver can be either AM broadcast, FM broadcast, VHF-Lo, VHF-Hi, or UHF. It is also possible to substitute some other receiver for the NOAA Weather Radio Receiver so that the unit can be fitted with any combination of two receiver modules.

The unit also has the ability to store the audio announcement from the last EAS message received and to display, on a built-in liquid crystal display (LCD), information about the event originator, type of event, area effected by the emergency, a date and time stamp, and the identification of the entity from whom the message was received.[5] It also has an RS-232C output port that is capable of interface to a character generator and another RS-232C output capable of driving a large LED display or array.

TFT has deployed the Safety 1st in many areas of the country to industrial plants, commercial buildings, offices, hospitals, schools, churches, and residential complexes. The Safety 1st can alarm, decode and display EAS messages, and even interface to a character

---

[3] Ibid.
[4] 47 C.F.R. § 11.33

generator for display of an EAS message over a closed-circuit composite video signal. It provides alerting to many people in each of the applications in which it is deployed.

The TFT Safety 1st is not compliant with Part 11 requirements for EAS decoders because is does not have a digital input[6] and does not have the ability to record and store the last 10 message header codes received.[7] It is a relatively simple device for applications in which the public needs to receive an EAS message, receive a subsequent alerting signal, hear the audio announcement locally or on a public address system output, have the message displayed on a "local" LCD or on a larger display, and have that message recorded automatically.

The intended markets for the TFT Safety 1st device are not unlike both the smaller cable television system and low power TV and FM markets, in which signals need to be received from monitored stations and processed for event and location according to EAS protocol, heard, displayed, and broadcast.

Intent of EAS to Notify the Public

The whole point of an emergency alerting system is to notify as many persons to the likelihood of an emergency that effects them directly. If more people can be notified more quickly, it seems to be in the public interest. If more cable television entities, more low power TV and FM operators, more open video suppliers, more cellular telephone carriers, and more paging companies can be empowered to implement EAS in any fashion, it would also seem to be in the public interest.

---

[5] 47 C.F.R. § 11.31
[6] 47 C.F.R. § 11.33(1)
[7] 47 C.F.R. § 11.33(2)

Waivers of EAS implementation,[8] timetables to implement,[9] and testing all appear to be impediments to alerting the public on a wider scale. Earlier, voluntary compliance for small cable operators, low power TV and FM will greatly benefit the public. By forwarding weekly tests from received stations, small cable operators, low power TV, and low power FM operators would be able to provide testing of their systems even if they could not generate tests themselves[10].

Because digital broadcasting standards have yet to be adopted, it is still premature to consider digital standards, although many broadcasters are voluntarily placing EAS messages into digital television signals.

Another factor to consider is whether increased regulation will force more broadcasters and cablecasters into a non-participating category.[11] Non-participating smaller cable television operators, low power TV and low power FM operators, would cease operations in the event of a national emergency[12] instead of simply alerting the public with a simple decoder-only solution and then maintaining their operations to inform the public further through their normal programming channels.

Conclusion

For reasons described above, TFT asks the Commission to consider a decoder-only solution for smaller cable television operators, low power TV and low power FM operators with relaxed standards for EAS decoders. This action will reduce costs to these groups by permitting

---

[8] Paragraphs 19 and 20, 2nd Report and Order, FCC 97-288, FO Docket 91-301/91-171, September 24, 1997.

[9] Ibid., Paragraph 25.

[10] 47 C.F.R. § 11.61

[11] 47 C.F.R. § 11.41(b)

them to employ existing low-cost equipment to alert more segments of the public to emergency situations.

Respectfully submitted,

Darryl E. Parker
Senior Vice President
TFT, Inc.
2243 Ringwood Avenue
San Jose, California 95131-1737
Tel: 408-943-9323, Extension 215
Fax: 408-243-9218
E-mail: Dparker@TFTInc.com

[12] 47 C.F.R. § 11.54(b)(4)(ii)